

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE

Case No. 06-40437
Chapter 7
Judge Tucker

Michele Watson
Debtor

WALTER A. METZEN (P49779)

Attorney for Debtor(s)
3156 Penobscot Building
645 Griswold Street
Detroit MI 48226
(313) 962-4656

**EX PARTE MOTION TO REOPEN BANKRUPTCY CASE TO ALLOW DEBTOR TO FILE
CERTIFICATION REGARDING DOMESTIC SUPPORT OBLIGATIONS SO THAT
DISCHARGE ORDER MAY BE ENTERED**

NOW COME(S) the debtor(s), by and through attorney Walter Metzen, and state(s) to the Court as follows:

1. That debtor(s) Michele Watson filed this case on January 13, 2006.
2. That the Certification Regarding Domestic Support was not filed in a timely manner resulting in the case being Closed without Discharge. The specific reason for the failure to timely file the Certificate was due to a clerical error. The debtor did in fact complete her e Certificate however it was not timely filed under the "new local rules" timeline.

WHEREFORE, Debtor(s) request(s) that the Bankruptcy Case be Reopened for the purpose of Allowing the Debtor to File Certification Regarding Domestic Support so that a Discharge Order may be Entered by the Court.

/s/ Walter A. Metzen

WALTER A. METZEN (P49779)

Attorney for Debtor
3156 Penobscot Building
645 Griswold Street
Detroit MI 48226

DATED: October 9, 2008

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NOTICE OF TIME TO FILE A RESPONSE TO MOTION

Michele Watson has filed papers with the Court to be allowed

**TO REOPEN BANKRUPTCY CASE TO ALLOW DEBTOR TO FILE CERTIFICATION OF
DOMESTIC SUPPORT SO THAT DISCHARGE ORDER MAY BE ENTERED**

**Your rights may be affected. You should read these papers carefully and discuss them with you
attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to
consult one.)**

If you do not want the Court to grant the motion, or if you want the Court to consider your views on the motion, within 15 days, you or your attorney must:

1. File with the Court a written response or an answer, explaining your position at:
**United States Bankruptcy Court
211 West Fort Street, Suite 2100
Detroit MI 48226**

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to :

WALTER A. METZEN (P49779)
Attorney for Debtor(s)
3156 Penobscot
645 Griswold
Detroit MI 48226
(313) 962-4656

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought on the motion and may enter an order granting that relief.

/s/ Walter A. Metzen

WALTER A. METZEN (P49779) Attorney for Debtor
3156 Penobscot Building
645 Griswold Street
Detroit MI 48226
(313) 962-4656

DATED: October 9, 2008

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Detroit MI 48226
(313) 962-4656

PROOF OF SERVICE

The undersigned certifies that on October 9, 2008 he served the US Trustee, the Interim Trustee and the affected creditors, listed below and/or on the attached sheet, by placing copies of the attached in sealed envelopes addressed to the respective parties, with adequate postage thereon and dropping same into a United States mail box or via electronic means via CM/ECF.

US Trustee
Suite 700
211 West Fort Street
Detroit MI 48226

Tammy L Terry
Chapter 13 Trustee
Suite 2100
535 Griswold
Detroit, MI 48226

/s/ Walter A. Metzen

WALTER A. METZEN (P49779)

Attorney for Debtor(s)
3156 Penobscot Building
645 Griswold Street
Detroit MI 48226
(313) 962-4656

DATED: October 9, 2008

Label Matrix for local noticing
0645-2
Case 06-40437-tjt
Eastern District of Michigan
Detroit
Thu Oct 9 12:49:44 EDT 2008

Chrysler Financial Co. LLC
PO Box 551080
Jacksonville FL 32255-1080

GE Money Bank
PO Box 960061
Orlando FL 32896-0061

Home Depot Processing Center
PO Box 689100
Des Moines IA 50368-9100

Marshall Field's
PO Box 66955
St Louis, MO 63166

Peoples Trust Credit Union
24333 Lahser Road
Southfield MI 48033-6041

Sears
Payment Center
PO Box 182149
Columbus OH 43218-2149

Verizon Wireless Customer Service
5175 Emerald Parkway
Dublin OH 43017-1067

Wells Fargo Financial Acceptance
2nd Floor 13675 Technology Dr., Bldg C
Eden Prairie, MN 55344

Chrysler Financial
PO Box 225
Royal Oak MI 48068-0225

Countrywide Home Loans
Attn: Customer Service
PO Box 5170
Simi Valley CA 93062-5170

GE Money Bank
PO Box 981127
El Paso TX 79998-1127

Household Bank (SB), N.A. (Art Van)
eCast Settlement Corporation
c/o Bass & Associates, P.C.
3936 E. Ft. Lowell Road, Suite #200
Tucson, AZ 85712-1083

Marshall Field's Collection Department
111 Boulder Industrial Drive
Bridgeton MO 63044-1241

Peoples Trust Credit Union
PO Box 984
Southfield MI 48037-0984

Shermeta & Adams
PO Box 5016
Rochester Hills MI 48308-5016

Michele Watson
42739 Pinehurst Dr
Clinton Township, MI 48036-1472

Tamara A. White
28366 Franklin Road
Southfield, MI 48034-5503

Chrysler Financial Co
Payment Processing Center
Department 0050
Palatine IL 60055-0050

GE CONSUMER FINANCE
GE CONSUMER FINANCE
PO BOX 960061
ORLANDO , FL 32896-0061

Holzman, Ritter & Leduc, PLLC
28366 Franklin Road
Southfield, MI 48034-5503

LVNV Funding LLC., its successors and assign
Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0587

Walter A. Metzen
3156 Penobscot Building
645 Griswold
Detroit, MI 48226-4105

Retail Services
Department 7680
Carol Stream IL 60116-0001

Tammy L. Terry
Buhl Building
535 Griswold
Suite 2100
Detroit, MI 48226-3681

Wells Fargo
PO BOX 250
Essington PA 19029-0250

eCAST Settlement Corporation
POB 35480
Newark NJ 07193-5480

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Peoples Trust Credit Union

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	1
Total	27

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(313) 962-4656

**ORDER REOPENING BANKRUPTCY CASE TO ALLOW DEBTOR TO FILE CERTIFICATION
OF DOMESTIC SUPPORT SO THAT DISCHARGE ORDER MAY BE ENTERED**

HAVING READ AND FILED debtor's motion filed pursuant to LBR 9014-1(a)(b) as well as Debtor's Certificate of No Response, and there being no objections having been filed in these regards,

NOW, THEREFORE, IT IS HEREBY ORDERED THE ABOVE CAPTIONED BANKRUPTCY CASE IS REOPENED FOR PURPOSES OF ALLOWING DEBTOR TO FILE CERTIFICATION OF DOMESTIC SUPPORT SO THAT DISCHARGE ORDER MAY BE ENTERED